

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Billed Party Preference for)
InterLATA 0+ Calls)

CC Docket No. 92-77

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT) submits these Comments in response to the Commission's Second Further Notice of Proposed Rulemaking (SFNPRM) in the captioned docket. While previously SWBT has been a major proponent of Billed Party Preference (BPP),¹ SWBT now believes that the time has passed for implementation of this service. Access code dialing is now virtually ubiquitous. Several important matters remain for Commission resolution, but BPP is no longer one of them.

To replace BPP, the Commission suggests price controls, which are inconsistent with both the spirit and letter of the Telecommunications Act of 1996. Congress has expressed a clear intent that the telecommunications industry be subject to market-based competition. Price controls are anathema to competition and would ensure that rates remain high. The Commission should abandon this idea and allow the market to function.

No. of Copies rec'd _____
List ABCDE _____

¹ In very general terms, BPP would have ensured that the billed party's carrier of choice would have transmitted each and every call.

Southwestern Bell Telephone Company
July 17, 1996

I. BPP IS NO LONGER NECESSARY.

Through the advertising of the largest Interexchange Carriers (IXCs), consumers have learned to reach the Operator Service Provider (OSP) of choice by access code dialing. New carriers entering the long distance market likely will promote access code dialing as well. Access code dialing has grown so large that BPP, which would have an enormous implementation cost, is no longer a viable alternative.

Deployment of BPP would take years, particularly if it is attempted as a retrofit into a number portability design. No incentive would remain for carriers, after spending millions to advertise and promote access code dialing, to spend additional millions to convince consumers to change their behavior back again and embrace 0+ dialing. Thus, the time for BPP has come and gone and the issue should now be closed.

The SFNPRM does not mandate BPP. Paragraph four, however, indicates that, as local number portability (LNP) develops, the Commission may reassess BPP. The network design now expected to be used for LNP involves a different database solution and query type than that needed for BPP. The two systems would be incompatible in structure and function. Thus, local number portability should not stimulate further consideration of BPP by the Commission.

II. PRICE DISCLOSURE FOR 0+ CALLS SHOULD NOT BE REQUIRED.

Paragraph 15 of the SFNPRM requests comment on the benefits and costs of price-disclosure for all 0+ calls. The costs would be large, and the benefits would be small. Further, the Commission

need not require all carriers (including Local Exchange Carriers [LECs]) to disclose prices for 0+ calls. Not all carriers charge exorbitant rates for 0+ calls; the Commission should not impose stringent regulations on all carriers because of the actions of a few. If a limited number of carriers are the subject of "price gouging" complaints, then those carriers must be dealt with individually. The Commission need not use a "shotgun approach" and impose burdensome regulations on all carriers.

Currently, many LECs do not possess the technology for real time rating of 0+ calls. Considerable cost would be incurred for such development and deployment. Price disclosure would require unique messages for each tariffed rate of every LEC or IXC served by an OSP, thereby quickly exhausting current storage capacity. Additional trunks would be required because of the holding time necessary to play the announcements. Consumers would immediately begin to experience call-completion delay and possibly higher rates. Perhaps most importantly, price-disclosure might not alert the billed party for collect or third-number calls. BPP would have allowed the billed party to receive collect and third-number calls on that party's chosen network; but the time for BPP implementation has come and gone, and price disclosure cannot take its place.

Paragraph 35 tentatively adopts the disclosure rule suggested by Colorado--announcement during "branding" of a seven minute sample rate. The price quoted would be the highest possible that the customer might be charged. Apparently, however, the Commission intends to allow an OSP to disclose an average rate, if the OSP feels the highest rate would be misleading. Confusion will be engendered if one OSP discloses the highest rate, while another averages. Consumers intending

to make a one or two minute call may be discouraged for fear of being charged the seven minute rate.

This suggestion should not be adopted.

III. PRICE CONTROLS WILL NOT WORK.

Paragraph 23 of the SFNPRM states the Commission's tentative conclusion that, since BPP was not implemented when it was needed, the next best alternative is price controls. Price controls, to the extent they were ever appropriate, are unacceptable after passage of the Telecommunications Act of 1996. While the rest of the industry moves to open markets, OSPs cannot be shunted into highly regulated, price-controlled environments.

The Commission suggests that a "benchmark" would use an average of the prices of AT&T, MCI and Sprint. This might result in fewer complaints to the Commission, but it would do nothing to aid consumers taking the trouble to access code dial their preferred IXC's. Benchmarked price controls, in fact, would likely ensure that carriers would never lower their rates. Aggregator locations are presubscribed to specific carriers which have little incentive to lower prices, absent extensive dial-around. If prices are controlled, however, and if many carriers serving aggregator locations initially price to the limit, as is often the case in price-controlled environments, the incentive to use dial-around will be lost, since all carriers will be charging the same rates. Price controls would thus, in the long run, greatly diminish, if not eliminate, dial-around, the only stimulus to lower rates.

Paragraph 29 suggests that LECs should be prohibited from billing for "OSPs whose rates exceed the benchmark unless the Commission has found those rates to be reasonable." Apart from the problem of needing to hold rate cases to determine if OSP rates are reasonable, with all the attendant regulatory burdens which Congress sought to eliminate in the Telecommunications Act of 1996, LECs cannot be the Commission's enforcement mechanism. The data which LECs receive from OSPs is insufficient for LECs to determine if the controlled price has been exceeded.

IV. ALL OSPs MUST BE TREATED EQUALLY.

Paragraphs 40-42 of the SFNPRM request comment on the effectiveness of informational tariffs. Paragraph 47 asks whether informational tariffs, if required, should contain specific rates rather than rate ranges.

Informational tariffs will not aid consumers in determining whether to use a particular OSP, because a consumer using a payphone does not have ready access to the tariffs. Likewise, consumers will gain virtually nothing from price disclosure at the beginning of a call. The SFNPRM suggests that consumers, given such price information, might negotiate with some bargaining power. It is unrealistic to expect that OSPs will conduct negotiation sessions with a customer standing at a payphone. The one tool with which consumers may protect themselves --access code dialing-- already exists.

In paragraph 44 of the SFNPRM the Commission suggests that non-dominant OSPs should not be required to file tariffs at all, informational or otherwise. In a market as competitive as


operator services, all carriers must be regulated equally. The Commission's pro-competitive goals will be undermined by any continuing distinctions in the manner in which OSPs are regulated. Thus, mandatory de-tariffing of non-dominant OSPs, without de-tariffing all competitors, fails to meet the Commission's pro-competitive goals.

V. CONCLUSION

BPP is no longer viable. In its place, the Commission proposes price controls which, if adopted, would return the industry to strict regulation. This is totally out of step with the Telecommunications Act of 1996, which expresses Congressional reliance on market-based competition to spur innovation and new market entrants. The Commission should rethink its approach and move rapidly to deregulate this already highly competitive segment of the industry.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By 
Robert M. Lynch
Durward D. Dupre
J. Paul Walters, Jr.

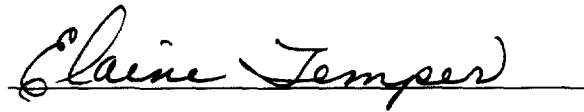
Attorneys for
Southwestern Bell Telephone Company

One Bell Center, Room 3520
St. Louis, Missouri 63101
(314) 235-2507

July 17, 1996

Certificate of Service

I, Elaine Temper, hereby certify that the Comments of Southwestern Bell Telephone Company in docket 92-77, have been served this 17th day of July, 1996 to the Parties of Record.

A handwritten signature in cursive script, reading "Elaine Temper", is written over a horizontal line.

Elaine Temper

July 17, 1996

WILLIAM E WEISMAN
WEISMAN ENTERPRISES INC
2626 W LAKE STREET
MINNEAPOLIS MN 55416-4405

HENRY WALKER
TENNESSEE PUBLIC SERVICE
COMMISSION
460 JAMES ROBERTSON PARKWAY
NASHVILLE TN 37219

JO ANN GODDARD
DIRECTORY-FED REGULATORY
PACIFIC BELL
NEVADA BELL
1275 PENNSYLVANIA AVE NW
SUITE 400
WASHINGTON DC 20004

TRUDI RENWICK PHD
ECONOMIC POLICY ANALYST
PUBLIC UTILITY LAW PROJECT
OF NEW YORK INC
39 COLUMBIA STREET
ALBANY NEW YORK 12207-2717

HELEN A SHOCKEY
BELLSOUTH CORPORATION
4300 SOUTHERN BELL CENTER
675 WEST PEACHTREE STREET NE
ATLANTA GEORGIA 30375

ANNE U MACCLINTOCK
VP-REGULATORY AFFAIRS & PUBLIC POLICY
SOUTHERN NEW ENGLAND TELEPHONE
COMPANY
227 CHURCH STREET
NEW HAVEN CT 06506

LEON M KESTENBAUM
H RICHARD JUHNKE
US SPRINT COMMUNICATIONS COMPANY
1850 M STREET NW
SUITE 1110
WASHINGTON DC 20036

JOHN T LENAHA
FRANK M PANEK
LARRY A PECK
AMERITECH OPERATING COMPANIES
2000 WEST AMERITECH CENTER DR
ROOM 4H86
HOFFMAN ESTATES IL 60196-1025

DEBRA W SCHIRO
FLORIDA PUBLIC SERVICE COMMISSION
1010 EAST GAINES STREET
TALLAHASSEE FL 32399-0861

GREGORY CASEY
INTERNATIONAL TELECHARGE INC
6707 DEMOCRACY BLVD
BETHESDA MD 20817

RANDALL B LOWE
SHERRY F BELLAMY
SUZANNE M TETREAULT
METROMEDIA LONG DISTANCE INC
JONES DAY REAVIS & POGUE
1450 G STREET NW
WASHINGTON DC 20005

PAUL RODGERS
NATIONAL ASSOCIATION OF REGULATORY
UTILITY COMMISSIONERS
1102 ICC BUILDING
PO BOX 684
WASHINGTON DC 20044

W DEWEY CLOWER
HOWARD N MENAKER
NATIONAL ASSOCIATION OF TRUCK STOP
OPERATORS
1199 NORTH FAIRFAX STREET
SUITE 801
ALEXANDRIA VA 22314

ANDREW D LIPMAN
RUSSELL M BLAU
ZERO PLUS DIALING INC
SWIDLER & BERLIN CHARTERED
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

RICHARD E WILEY
DANNY E ADAMS
JANE A FISHER
OPERATOR SERVICE PROVIDERS OF
AMERICA
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

JOSEPHINE S TRUBEK
GREGG C SAYRE
ROCHESTER TELEPHONE CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646-0700

DAVID WAGENHAUSER
TELECOMMUNICATIONS RESEARCH AND
ACTION CENTER (TRAC)
PO BOX 12038
WASHINGTON DC 20005

RANDALL S COLEMAN
LAWRENCE E SARJEANT
U S WEST
1020 19TH STREET NW
SUITE 700
WASHINGTON DC 20036

LINDA KENT
ASSOCIATE GENERAL COUNSEL
USTA
1401 H STREET NW STE 600
WASHINGTON DC 20005-2136

EDWARD R WHOLL
WILLIAM J BALCERSKI
NYNEX
120 BLOOMINGDALE ROAD
WHITE PLAINS NY 10605

BRYAN G MOORHOUSE
PUBLIC SERVICE COMMISSION OF
MARYLAND
6 SAINT PAUL STREET
BALTIMORE MD 21202-1631

H RICHARD JUNKE
JAY C KEITHLEY
UNITED TELECOMMUNICATIONS INC
1850 M STREET NW
11TH FLOOR
WASHINGTON DC 20036

FRANCINE J BERRY
MARK C ROSENBLUM
ROBERT J MCKEE
AT&T
295 NORTH MAPLE AVENUE
ROOM 3244J1
BASKING RIDGE NJ 07920

ROY L MORRIS
ALLNET COMMUNICATIONS SERVICES
INC
1990 M STREET NW
SUITE 500
WASHINGTON DC 20036

MARY J SISAK
DONALD L ELARDO
MCI TELECOMMUNICATIONS CORP
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

ROBERT M PEAK
UNITED ARTISTS PAYPHONE CORP
REBOUL MACMURRAY HEWITT
MAYNARD & KRISTOL
1111 19TH STREET NW
SUITE 406
WASHINGTON DC 20036

JOHN M GOODMAN
BELL ATLANTIC
1320 N COURT HOUSE ROAD 8TH FL
ARLINGTON VA 22201

(2 COPIES)
POLICY & PROGRAM PLANNING
DIVISION
COMMON CARRIER BUREAU
1919 M STREET NW
ROOM 544
WASHINGTON DC 20554

RANDOLPH J MAY
DAVID A GROSS
ELIZABETH C BUCKINGHAM
SUTHERLAND ASBILL & BRENNAN
CAPITAL NETWORK SYSTEM INC
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004-2404

ANDREW D LIPMAN
ROBERT G BERGER
SWIDLER & BERLIN CHTD
COASTAL AUTOMATED COMMUNICATIONS
CORPORATION
EASTERN TELECOM CORPORATION
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

DOUGLAS F BRENT
LDDSMETROMEDIA COMMUNICATIONS
9300 SHELBYVILLE ROAD SUITE 700
LOUISVILLE KY 40222

MARTA GREYTOK
KARL RABAGO
ROBERT W GEE
PUBLIC UTILITY COMMISSION OF
TEXAS
7800 SHOAL CREEK BLVD
SUITE 400N
AUSTIN TX 78757

SUSAN M SHAHAMAN
CENTRAL ATLANTIC PAYPHONE ASSOC
21 N 4TH STREET
HARRISBURG PA 17101

DANNY E ADAMS
STEVEN A AUGUSTINO
KELLY DRYE & WARREN
COUNSEL FOR
COMPETITIVE TELECOMMUNICATIONS
ASSOCIATION
1200 19TH ST NW STE 500
WASHINGTON DC 20036

GAIL L POLIVY
GTE SERVICE CORPORATION
1850 M STREET NW
SUITE 1200
WASHINGTON DC 20036

JOHN F DODD
BRAD I PIERSON
INDEPENDENT TELECOMMUNICATIONS
NETWORK INC
SMITH GILL FISCHER & BUTTS
1 KANSAS CITY PLACE
1200 MAIN STREET 35TH FLOOR
KANSAS CITY MO 64105-2152

JUDITH ST LEDGER-ROTY
PUBLIC TELECOMMUNICATIONS
COUNCIL INC
REED SMITH SHAW & MCCLAY
1200 18TH STREET NW
WASHINGTON DC 20036

JUDITH ST LEDGER-ROTY
ROBERT J AAMOTH
INTELLICALL INC
REED SMITH SHAW & MCCLAY
1200 18TH STREET NW
WASHINGTON DC 20036

ALBERT H KRAMER
ROBERT F ALDRICH
AMERICAN PUBLIC COMMUNICATIONS
COUNCIL
KECK MAHIN & CATE
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005-3919

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN
ATTORNEYS FOR ROBERT CEFAIL & ASSOC
AMERICAN INMATE COMMUNICATIONS INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

DAVID COSSEN
L MARIE GUILLORY
NATIONAL TELEPHONE COOPERATIVE
ASSOCIATION
2626 PENNSYLVANIA AVE NW
WASHINGTON DC 20037

LINDA T MUIR
CONTEL CORPORATION
245 PERIMETER CENTER PARKWAY
PO BOX 105194
ATLANTA GA 30348

DEBORAH BARRETT
ONE CALL COMMUNICATIONS INC
D/B/A OPTICOM
801 CONGRESSIONAL BLVD
SUITE 100
CARMEL IN 46032

JAMES P TUTHILL
NANCY C WOOLF
THERESA L CABRAL
PACIFIC BELL
NEVADA BELL
140 NEW MONTGOMERY STREET ROOM 1523
SAN FRANCISCO CALIFORNIA 94105

W AUDIE LONG ESQ
KENNETH F MELLEY JR
US LONG DISTANCE INC
9311 SAN PEDRO SUITE 300
SAN ANTONIO TEXAS 78216

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
ATTORNEYS FOR
LDDS COMMUNICATIONS INC
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

ZERO PLUS DIALING INC
ALAN W SALTZMAN
SENIOR VICE PRESIDENT
9311 SAN PEDRO SUITE 300
SAN ANTONIO TX 78216

COMTEL COMPUTER CORPORATION
JOHN A LIGON
128 MOUNT HEBRON AVENUE
PO BOX 880
UPPER MONTCLAIR NJ 07043

PHONETEL TECHNOLOGIES INC
MITCHELL F BRECHER
DOW LOHNES & ALBERTSON
1255 TWENTY-THIRD STREET NW
WASHINGTON DC 20554

VALUE-ADDED COMMUNICATIONS INC
GLENN B MANISHIN
ITS ATTORNEY
BLUMENFELD & COHEN
1615 M STREET NW SUITE 700
WASHINGTON DC 20036

CLEARTEL COMMUNICATIONS INC AND
COM SYSTEMS INC
JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

QUEST COMMUNICATIONS CORPORATION
RICK L ANTHONY
EXECUTIVE VICE PRESIDENT
8829 BOND STREET
SHAWNEE MISSION KANSAS 66214-1707

SDN USERS ASSOCIATION INC
LARRY MORELAND
PRESIDENT
C/O CATERPILLAR INC
600 W WASHINGTON STR AD341
EAST PEORIA ILLINOIS 61630

DARRELL S TOWNSLEY
ILLINOIS COMMERCE COMMISSION
180 NORTH LASALLE STREET
SUITE 810
CHICAGO IL 60601

KEITH J ROLAND
ROLAND FOGEL KOBLEZ & CARR
ONE COLUMBIA PLACE
ALBANY NY 12207

HELEN M HALL
KECK MAHIN & CATE
INMATE CALLING SERVICE TASK FORCE
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3919

STEPHEN G KRASKIN
KRASKIN & ASSOCIATES
ATTORNEY FOR US INTELCO NETWORKS
INC
2120 L STREET NW
SUITE 520
WASHINGTON DC 20037

STEVEN J JOGAN
LINKUSA
230 2ND STREET SE
SUITE 400
CEDAR RAPIDS IA 52401

JAMES D HEFLINGER
LITEL TELECOMMUNICATIONS CORP
D/B/A LCA INTERNATIONAL
4650 LAKEHURST COURT
DUBLIN OH 43017

BERN E CASE AAE
LUBBOCK INTERNATIONAL AIRPORT
ROUTE 3 BOX 389
LUBBOCK TX 79401

DEBRA L LAGAPA
MARY K O'CONNELL
MORRISON & FOERSTER
MASTERCARD INTERNATIONAL INCORP
2000 PENNSYLVANIA AVE NW
SUITE 5500
WASHINGTON DC 20006

JERRY L MCMICHAEL
MEMPHIS INTERNATIONAL AIRPORT
PO BOX 30168
MEMPHIS TN 38130-0168

DOUBLAS E NEEL
MESSAGEPHONE INC
5910 N CENTRAL EXPRESSWAY
SUITE 1575
DALLAS TX 75206

RONALD G CHOURA
MICHIGAN PUBLIC SERVICE COMMISSION
PO BOX 30221
LANSING MI 48909-7721

WILLIAM M BARVICK
MIDWEST INDEPENDENT COIN
PAYPHONE ASSOCIATION
231 MADISON STREET
JEFFERSON CITY MO 65101

COLLEEN M DALE
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY MO 65102

PATRICIA A SIMMONS
MONTANA STATE UNIVERSITY
OFFICE OF SYSTEMS & COMPUTING
SERVICES
RENNE LIBRARY BASEMENT
BOZEMAN MT 59717-0324

ALAN J THIEMANN
TAYLOR THIEMANN & AITKIN
NATIONAL ASSOCIATION
OF CONVENIENCE STORES
908 KING STREET
SUITE 300
ALEXANDRIA VA 22314

EILEEN E HUGGARD
CITY OF NEW YORK
DEPARTMENT OF TELECOMMUNICATIONS
AND ENERGY
75 PARK PLACE
6TH FLOOR
NEW YORK NY 10007

NIXON HARGRAVE DEVANS & DOYLE
ONE THOMAS CIRCLE
SUITE 800
WASHINGTON DC 20005

KENNETH R SCOTT
NORFOLK AIRPORT AUTHORITY
NORFOLK INTERNATIONAL AIRPORT
NORFOLK VA 23518-5897

ALBERT H KRAMER
ROBERT F ALDRICH
KECK MAHIN & CATE
NORTH AMERICAN TELECOMMUNICATIONS
ASSOCIATION
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005

LISA M ZAINA
OPASTCO
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

PAUL C BESOZZI
BESOZZI GAVIN & CRAVEN
POLAR COMMUNICATIONS CORPORATION
1901 L STREET NW
SUITE 200
WASHINGTON DC 20036

JOSEPHINE S TRUBEK
ROCHESTER TEL CENTER
RCI LONG DISTANCE INC
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646-0700

ELLEN M AVERETT
PENNSYLVANIA PUBLIC
UTILITY COMMISSION
PO BOX 3265
G-28 NORTH OFFICE BUILDING
HARRISBURG PA 17105-3265

GARY JOSEPH
SHARENET COMMUNICATIONS
PO BOX 14349
PHOENIX AZ 85063

BENJAMIN J GRIFFIN
LYNN E SHAPIRO
REED SMITH SHAW & MCCLAY
SC DIV OF INFO
RESOURCE MANAGEMENT
1200 18TH STREET NW
WASHINGTON DC 20036

PERRY R EICHOR
SC JAIL ADMINISTRATORS
ASSOCIATION
PO BOX 10171
GREENVILLE SC 29603

H RICHARD JUHNKE
SPRINT CORPORATION
1850 M STREET NW
11TH FLOOR
WASHINGTON DC 20036

JOHN W PRIEST
THE TELTRONICS GROUP
2150 WHITFIELD INDUSTRIAL WAY
SARASOTA FL 34243-4046

O LANE MCCOTTER
UTAH DEPARTMENT OF CORRECTIONS
6100 SOUTH 300 EAST
MURRAY UT 84107

PAMELA J BRANDON
WISCONSIN DEPT OF CORRECTIONS
POBOX 7925
MADISON WI 53707

JOHN B MOW
4801 SPRING VALLEY
SUITE 105A
DALLAS TX 75244

RANDOLPH J MAY
ELIZABETH C BUCKINGHAM
SUTHERLAND ASBILL & BRENNAN
ADVANCED TECHNOLOGIES CELLULAR
TELECOMMUNICATIONS INC
1275 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-2404

STEVE SCHUDE
ADVANCED PAYPHONE SYSTEMS INC
535 W IRON AVENUE
SUITE 122
MESA AZ 85210

BARNEY C PARRELLA
AIRPORTS ASSOCIATION COUNCIL
INTERNATIONAL NORTH AMERICA
1220 19TH STREET NW
SUITE 200
WASHINGTON DC 20036

BARBARA GREENE
DIRECTOR REGULATORY AFFAIRS
ALTERNATE COMMUNICATIONS TECHNOLOGY
8900 KEYSTONE CROSSING SUITE 1090
POST OFFICE BOX 40189
INDIANAPOLIS IN 46240-0189

BRIAN J KINSELLA
THOMAS F YOUNGBLOOD
AMERICAN HOTEL & MOTEL ASSOCIATION
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3931

AMERICAN JAIL ASSOCIATION
1000 DAY ROAD
SUITE 100
HAGERSTOWN MD 21740

JOHN F DODD
BRAD I PEARSON
SMITH GILL FISHER & BUTTS
AMERICAN TELEMAGEMENT INC
ONE KANSAS CITY PLACE
1200 MAIN STREET 35TH FLOOR
KANSAS CITY MO 64105-2152

VERNELL STURNS
DALLAS/FORT WORTH INTERNATIONAL
AIRPORT ADMINISTRATIVE OFFICE
EAST AIRFIELD DRIVE
PO DRAWER DFW
DALLAS/FT WORTH AIRPORT TX 75261

GEORGE CHRISTENBERRY JR
DEPARTMENT OF ADMINISTRATIVE SERVICES
TELECOMMUNICATIONS DIVISION
200 PIEDMONT AVENUE
SUITE 1402 WEST TOWER
ATLANTA GA 30334-5540

JAMES B DRONSFIELD
DIRECTOR TELECOMMUNICATIONS
DUKE UNIVERSITY
DURHAM NC 27706

WALTER STEIMEL JR
FISH & RICHARDSON
601 THIRTEENTH STREET NW
WASHINGTON DC 20005

JIM ALLEN
GASTON MEMORIAL HOSPITAL
2525 COURT DRIVE
PO BOX 1747
GASTONIA NC 28053-1747

RICHARD L GOLDBERG
GRAHAM & JAMES
ONE MARITIME PLAZA
THIRD FLOOR
SAN FRANCISCO CA 94111

MAURICE D MURPHY
HARVARD UNIVERSITY
OFFICE FOR INFORMATION TECHNOLOGY
10 WARE STREET
CAMBRIDGE MASS 02138

JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN CHTD
ATTORNEYS FOR OPUS CORRECTIONAL
INC D/B/A LOCTEL
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

TARIFF DIVISION
COMMON CARRIER BUREAU
1919 M STREET NW ROOM 518
WASHINGTON DC 20554

ITS INC
1919 M STREET NW
ROOM 246
WASHINGTON DC 20036

ARIZONA DEPARTMENT OF CORRECTIONS
1601 WEST JEFFERSON STREET
PHOENIX AZ 85007-3003

COMCENTRAL CORP
2150 WHITFIELD INDUSTRIAL WAY
SARASOTA FL 34243-4046

JAMES F MEEHAN
CONNECTICUT CONSUMER COUNSEL
136 MAIN STREET SUITE 501
NEW BRITIAN CT 06051

MITCHELL F BRECHER
DONELAN CLEARY WOOD &
MASER PC
PHONETEL
1275 K STREET NW SUITE 850
WASHINGTON DC 20005

EDWARD C ADDISON DIRECTOR
VIRGINIA STATE CORPORATION
COMMISSION STAFF
PO BOX 1197
RICHMOND VIRGINIA 23209

BRENT A KITCHEN
AIRPORTS DIRECTOR
TULSA INTERNATIONAL AIRPORT
PO BOX 581838
TULSA OKLAHOMA 74158

RL JONES JR
RIVERSIDE AIRPORT
PO BOX 340
JENKS OKLAHOMA 74037

BENJAMIN J GRIFFIN
JOHN W HUNTER
ANDREA S MIANO
REED SMITH SHAW & MCCLAY
1200 18TH STREET NW
WASHINGTON DC 20036

LARRY A FIELDS DIRECTOR
OKLAHOMA DEPT OF CORRECTIONS
3400 N MARTIN LUTHER KING AVENUE
OKLAHOMA CITY OKLAHOMA 73136

KARL D MYERS
DIRECTOR BUSINESS & PROPERTY
MANAGEMENT
SEATTLE-TACOMA
INTERNATIONAL AIRPORT
PO BOX 68727
SEATTLE WASHINGTON 98168

PATRICIA R TAPPAN COMMISSIONER
DEPARTMENT OF CORRECTION
ONONDAGA COUNTY
PO BOX 143
JAMESVILLE NEW YORK 13078

FRED A SPRUILL SHERIFF
CHOWAN COUNTY SHERIFF'S OFFICE
PO BOX 78
EDENTON NORTH CAROLINA 27932

EDWARD J CAMP SHERIFF
ADAMS COUNTY SHERIFF'S DEPT
1901 EAST BRIDGE STREET
BRIGHTON CO 80601-1937

ANTHONY W PELLICANE
DIRECTOR OF CORRECTIONS
MONMOUTH COUNTY DEPT OF CORRECTIONS
1 WATERWORKS ROAD
FREEHOLD NEW JERSEY 07728

DANIEL B CALVERT SHERIFF
500 NW 6TH/COURTHOUSE
GRANTS PASS OREGON 97526

DON HASS PRESIDENT
OKLAHOMA SHERIFFS' ASSOCIATION
PO BOX 1094
NORMAN OKLAHOMA 73070

MARGARTE VONHEEDER DIRECTOR
DIVISION OF MANAGEMENT & BUDGET
DEPT OF CORRECTIONS
PO BOX 41100
OLYMPIA WASHINGTON 98504-1100

J MANNING LEE
SENIOR REGULATORY COUNSEL
TELEPORT COMMUNICATIONS GROUP INC
2 TELEPORT DRIVE
STATEN ISLAND NY 10311

DAVID COSSON
ATTORNEY FOR NATIONAL TELEPHONE
COOPERATIVE ASSOCIATION
2626 PENNSYLVANIA AVEN NW
WASHINGTON DC 20037

GLENN B MANISHIN
NEIL S ENDE
BLUMENFELD & COHEN
1615 M STREET NW
SUITE 700
WASHINGTON DC 20036

CINDY Z SCHONHAUT ESQ
MFS COMMUNICATIONS COMPANY INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

MURRAY RICHARDSON SHERIFF
BAKER COUNTY
56 N 2ND STREET
MACCLENNY FL 32063

LT EDDY MARKHAM
PO BOX 1240
CARLSBAD NM 88221-1240

CARL POTEETE SHERIFF
AND COLLECTOR OF CONWAY
COUNTY
MORRILTON ARKANSAS 72110

PAUL BRODEUR COMMISSIONER
DEPT OF CORRECTIONS
OFFICE OF THE COMMISSIONER
105 PLEASANT ST MAIN BUILDING
4TH FLOOR
PO BOX 1806
CONCORD NH 03302-1806

LEROY MOODY SHERIFF
SAN PATRICIO COUNTY
PO BOX 1382
SINTON TEXAS 78387-1382

TOM SAWYER
SHERIFF-CORONER
2222 "M" STREET
MERCED CALIFORNIA 95340

CAPT RICK ADKINS
SHASTA COUNTY SHERIFF'S DEPT
MAIN JAIL FACILITY
1655 WEST STREET
REDDING CA 96001

CHARLES W GATES
CITY OF AUSTIN
3600 MANOR ROAD
AUSTIN TX 78723

EUGENE F MULLIN
CHRISTOPHER A HOLT
MULLIN RHYNE EMMONS AND TOPEL PC
1225 CONNECTICUT AVENUE NW
SUITE 300
WASHINGTON DC 20036-2604

CHERYL A TRITT
MORRISON & FOERSTER
2000 PENNSYLVANIA AVENUE NW
SUITE 5500
WASHINGTON DC 20006

STEVEN E SWENSON
ATTORNEY FOR TELTRUST INC
LINDBERGH PLAZA I
221 N CHARLES LINDBERGH DRIVE
SALT LAKE CITY UTAH 84116

BRAD E MUTSCHELKNAUS
ANN M PLAZA
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

WILLIAM F SHEPARD
GLOBAL TEL LINK
2609 CAMERON STREET
MOBILE ALABAMA 36607

MICHAEL H DAVIS
VP OPERATIONS/TELECOMMUNICATIONS
HOLIDAY INN CORPORATE HEADQUARTERS
THREE RAVINIA DRIVE SUITE 2000
ATLANTA GA 30346-2149

JOHN W ANDERSON AAE
AIRPORT DIRECTOR
3201 AIRPORT WAY
BOISE IDAHO 83705-5096

LINDA L TRATNIK PRESIDENT
SDN USERS ASSOCIATION INC
PO BOX 4014
BRIDGEWATER NJ 08807

BUFORD L CRIBB
ADELANTO COMMUNITY CORRECTIONAL
FACILITY
10400 RANCHO ROAD
PO BOX 5005
ADELANTO GA 82301-724

BILL ALESHIRE
COUNTY JUDGE
TRAVIS COUNTY
PO BOX 1748
AUSTIN TEXAS 78767

THOMAS E MAY CONTROLLER
MID CAL AUTO/TRUCK PLAZA
12310 S HIGHWAY 33 & I-5
SANTA NELLA CA 95322

BRYON SWANSON
COFFEE POT CAFE
7120 E 49TH AVENUE
COMMERCE CITY CO 80022

NANCI ADLER
CONSULTANT TO OPERATOR SERVICE
COMPANY
TECHNOLOGIES MANAGEMENT INC
163 E MORSE BLVD
SUITE 300
PO DRAWER 200
WINTER PARK FL 32790-0200

ALBERT H KRAMER
DAVID B JEPPSEN
ATTORNEYS FOR THE INMATE CALLING
SERVICES PROVIDERS TASK FORCE
KECK MAHIN & CATE
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3919

DEBRA BERLYN
NASUCA
1133 15TH STREET NW SUITE 575
WASHINGTON DC 20005

VINCENT TOWNEND PRESIDENT
NORTH CAROLINA PAYPHONE ASSOC
9 OAK BRANCH DRIVE
GREENSBORO NC 27407

DANIEL J ROOKS
4250 BLACKLAND DRIVE
MARIETTA GA 30067

CHERYL A TRITT
MORRISON & FOERSTER
COUNSEL FOR CITIZENS
UNITED FOR REHABILITATION
OF ERRANTS
2000 PENNSYLVANIA AVE NW
SUITE 5500
WASHINGTON DC 20006

MARK C ROSEMBLUM
AT&T CORP
295 NORTH MAPLE AVENUE
BASKING RIDGE NJ 07920

AMY S GROSS
ATTORNEY FOR AMERICAN NETOWKR
EXCHANGE INC
101 PARK AVENUE SUITE 2507
NEW YORK NY 10178

SHELDON ELLIOT STEINBACK
VP AND GENERAL COUNSEL
AMERICAN COUNCIL ON EDUCATION
ONE DUPONT CIRCLE NW
WASHINGTON DC 20036

ANNE GROSS
PROGRAM MANAGER PUBLIC POLICY
AND MANAGEMENT PROGRAMS
NATIONAL ASSOCIATION OF COLLEGE
AND UNIVERSITY BUSINESS OFFICERS
ONE DUPONT CIRCLE NW
WASHINGTON DC 20036

ELLYN ELISE CRUTCHER
COUNSEL FOR THE CONSOLIDATED
COMPANIES
121 SOUTH 17TH STREET
MATTOON IL 61938

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
ATTORNEYS FOR AIRPORTS ASSOCIATION
COUNCIL INTERNATIONAL - NA
SWIDLER & BERLIN CHTD
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

BARNEY C PARRELLA
SENIOR VICE PRESIDENT
1775 K STREET NW
SUITE 500
WASHINGTON DC 20006

KATHLEEN M HAWK DIRECTOR
US DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF PRISONS
WASHINGTON DC 20534

GERALD F WASHBURN
SHERIFF ONEIDA COUNTY
LAW ENFORCEMENT BUILDING
ORISKANY NEW YORK 13424-2271

LARRY P STEWART SHERIFF
SWISHER COUNTY
136 E BROADWAY
TULIA TEXAS 79088

KATHY L SHOBERT
DIRECTOR FEDERAL REGULATORY AFFAIRS
901 15TH STREET NW SUITE 900
WASHINGTON DC 20005

THOMAS ENGEL
DIRECTOR OF AIRPORTS
COUNTY OF SACRAMENTO
5900 AIRPORT BOULEVARD
SACRAMENTO CA 95837

SUSAN M SHANAMAN
ATTORNEY FOR THE CENTRAL ATLANTIC
PAYPHONE ASSOCIATION
21 NORTH 4TH STREET
HARRISBURG PENNSYLVANIA 17101

RICHARD O KLOTZ
DEPARTMENT OF CORRECTIONS
COUNTY OF LEHIGH
38 NORTH 4TH STREET
ALLENTOWN PENNSYLVANIA 18105

DANIEL E HORNBERGER WARDEN
CLARION COUNTY PRISON
5TH & MADISON
CLARION PA 16214

THOMAS A COUGHLIN III COMMISSIONER
DEPT OF CORRECTIONAL SERVICES
THE STATE OFFICE BUILDING CAMPUS
ALBANY NY 12226

FRANK WOOD COMMISSIONER
300 BIGELOW BUILDING
450 NORTH SYNDICATE STREET
ST PAUL MN 55104

JAMES H GOMEZ
DEPARTMENT OF CORRECTIONS
P O BOX 942883
SACRAMENTO CA 94283-0001

VINCENT A GUARINI
WARDEN
LANCASTER COUNTY PRISON
625 E KING STREET
LANCASTER PA 17602

GERALD NORLANFDER
DEPUTY DIRECTOR
PUBLIC UTILITY LAW PROJECT
OF NEW YORK INC
39 COLUMBIA STREET
ALBANY NY 12207-2717

HARRY K SINGLETARY JR
SECRETARY
FLORIDA DEPARTMENT OF
CORRECTIONS
2601 BLAIR STONE ROAD
TALLAHASSEE FLORIDA 32399-2500

MICHAEL W SCOTT CEO
CMS
731 WALKER ROAD
SUITE H-2
GREAT FALLS VA 22066

PERRY R OWEN
BUSINESS OWNER
P O BOX 60474
SACRAMENTO CA 95860

JAMES U TROUP
ARTER & HADDEN
COUNSEL FOR
IOWA NETWORK SERVICES INC
1801 K STREET NW STE 400K
WASHINGTON DC 20006

BRAD E MUTSCHELKNAUS
WILEY REIN & FIELDING
ATTORNEY FOR AMERITEL PAY
PHONES INC
1776 K STREET NW
WASHINGTON DC 20006

GLENN B MANISHIN
BLUMENFELD & COHEN
COUNSEL FOR GATEWAY
TECHNOLOGIES INC
1615 M STREET NW
SUITE 700
WASHINGTON DC 20036

MITCHELL F BRECHER
DONELAN CLEARY WOOD &
MASER PC
COUNSEL FOR ONCOR
COMMUNICATIONS INC
1275 K STREET NW
SUITE 850
WASHINGTON DC 20005-4078

BOB SCHOONMAKER
VICE PRESIDENT
GVNW INC/MANAGEMENT
PO BOX 25969
COLORADO SPRINGS CO 80936

CHARLES H HELEIN
HELEIN & WAYS DORF PC
COUNSEL FOR AMERICA'S
CARRIERS TELECOMMUNICATIONS
ASSOCIATION
1850 M STREET NW STE 550
WASHINGTON DC 20036

KATHY L SHOBERT
DIRECTOR FEDERAL REGULATORY
AFFAIRS
GENERAL COMMUNICATION INC
901 15TH STREET NW
SUITE 900
WASHINGTON DC 20005

ALANE C WEIXEL
COVINGTON & BURLING
1201 PENNSYLVANIA AVE NW
COUNSEL FOR ANCHORAGE TELEPHONE
UTILITY
WASHINGTON DC 20044-7566